

**PAM BASSEL STANDING CHAPTER 13 TRUSTEE**

Bar No.01344800  
860 Airport Freeway, Ste 150  
Hurst, TX 76054  
Phone: (817) 916-4710

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**IN RE:**

**CASE NO.: 24-42998-ELM -13**

**TINA RENA DELEON**

709 ATASCOSA AVE  
FT WORTH, TX 76120  
SSN/TIN: XXX-XX-1486

**DEBTOR**

**HEARING: NOVEMBER 7, 2024 AT 8:30 AM**

**TRUSTEE'S OBJECTION TO CONFIRMATION**

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

NOW COMES Pam Bassel Standing Chapter 13 Trustee and files this Trustee's Objection to Confirmation. Trustee would respectfully show the Court:

The Plan fails to meet the disposable income test of 11 U.S.C. Section 1325 (b) (1) (B) because the Plan does not propose to pay all of the Debtor's disposable income for the applicable commitment period to the Debtor's unsecured creditors.

The Plan provides for an unsecured creditors' pool ("UCP") of \$0.00. The Trustee has calculated a UCP of \$48,724.80 based on a monthly disposable income of \$812.08 over a 60 month applicable commitment period, with the following add-backs, if any:

FORM 122C-2 LINE 16 TAX WITHHOLDING OVERSTATED PER	62.62
SCHEDULE I LINE 5A	
FORM 122C-2 LINE 23 OPTIONAL TELEPHONE	40.00
SCH I LINE 4 GROSS INCOME UNDERSTATED PER PAYSTUBS	219.58

The Plan does not meet the requirements of the best interests of creditors test of 11 U.S.C. Section 1325(a)(4). Debtor has equity in non-exempt property as follows:

The total equity in non-exempt property is approximately \$ 3220 but the Plan provides for equity in non -exempt property of only \$0.00.

The Debtor's Attorney's Fees exceed the court's guidelines for a "no-look" fee.

WHEREFORE, Trustee prays that confirmation be DENIED and for general relief.

Respectfully submitted,

By: /s/ Ethan S. Cartwright  
Ethan S. Cartwright, Staff Attorney  
Bar No. 24068273  
PAM BASSEL STANDING CHAPTER 13 TRUSTEE  
Bar No. 01344800  
860 Airport Freeway, Ste 150  
Hurst, TX 76054  
(817) 916-4710 Phone

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on or before the date of filing. Service was accomplished electronically on Debtor's attorney and all parties entitled to electronic notice and by first class mail on the Debtor and the parties listed below, if any.

By: /s/ Ethan S. Cartwright  
Ethan S. Cartwright

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